

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA	:	GOVERNMENT'S FORFEITURE
-v.-	:	<u>BILL OF PARTICULARS</u>
MIKHAIL ZEMLYANSKY, et al.,	:	S1 12 Cr. 171 (JPO)
	:	
Defendants.	:	
- - - - -	:	

Pursuant to United States v. Grammatikos, 633 F.2d 1013, 1024 (2d Cir. 1980), the Government respectfully gives notice that the property subject to forfeiture as a result of the offenses alleged in Counts One through Four of the Indictment, as alleged in the Indictment's Forfeiture Allegations, includes all of the defendants' right, title, and interest in the contents of the following accounts:

1. Account no. 3112487033, held in the name of Joseph Vitoulis DO, P.C. at JP Morgan Chase
2. Account no. 827426362, held in the name of Joseph Vitoulis DO, P.C. at JP Morgan Chase
3. Account no. 483036710444, held in the name of NTT Medical PC at Bank of America
4. Account no. 831427489, held in the name of Maguire Medical Practice PC at JP Morgan Chase
5. Account no. 749858023, held in the name of McGuire Medical PC at JP Morgan Chase

6. Account no. 483030419990, held in the name of Grand Concourse Medical PC at Bank of America
7. Account no. 483039116168, held in the name of Paragon Medical Care PC at Bank of America
8. Account no. 483036478728, held in the name of Aniko Acupuncture PC at Bank of America
9. Account no. 483040040812, held in the name of Ankar Acupuncture PC at Bank of America
10. Account no. 483014971276, held in the name of Kali Acupuncture PC, Pavel L. Poznanskiy at Bank of America
11. Account no. 009420270382, held in the name of M & S Acupuncture PC at Bank of America
12. Account no. 483012300522, held in the name of Somich Acupuncture PC Operating Account at Bank of America
13. Account No. 4252782036, held in the name of Acuhealth Acupuncture PC at TD Bank
14. Account no. 4254944113, held in the name of Bay Needle Care Acupuncture PC at TD Bank
15. Account No. 483040039027, held in the name of Bay Needle Care Acupuncture PC at Bank of America
16. Account no. 4257592282, held in the name of New Century Acupuncture PC at TD Bank
17. Account no. 7917735149, held in the name of V.S. Care Acupuncture PC at TD Bank
18. Account no. 4252471192, held in the name of TC Acupuncture PC at TD Bank
19. Account no. 483036909802, held in the name of Bronx-Metro Chiropractic Health Services PC at Bank of America
20. Account, no. 483036909815 held in the name of Bronx-Metro Chiropractic Health Services PC at Bank of America
21. Account no. 672776324, held in the name of Medway Medical Diagnostics Care PC at HSBC

22. Account no. 872761564, held in the name of Clearview of Brooklyn Medical PC at JP Morgan Chase
23. Account no. 831070297, held in the name of Ocean Chiropractic PC at JP Morgan Chase
24. Account no. 483031217751, M & M Complete Equipment Inc. held at Bank of America
25. Account no. 959986563, held in the name of Montclair Capital Group NY, Inc. at JP Morgan Chase
26. Account no. 7510004851, held in the name of Active Consulting Group LTD at Apple Bank
27. Account no. 009432676451, held in the name of Mind Body Soul Inc dba All Organic Gourmet at Bank of America
28. Account no. 672776090, held in the name of Tri-State Billing Corp. at HSBC
29. Account no. 672775492, held in the name of No Limits Funding Corp. at HSBC
30. Account no. 763841046, held in the name of Michael Barukhin at JP Morgan Chase
31. Account no. 889197562, held in the name of Mikhail Zemlyansky at JP Morgan Chase

The Government further gives notice that, as an independent and separate basis, the funds and other property in these above-described accounts are forfeitable as substitute assets, pursuant to Title 21, United States Code, Section 853(p), as specified in the Indictment.

Dated: New York, New York
June 15, 2012

Respectfully Submitted,

PREET BHARARA
United States Attorney

By: /s/
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